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December 11, 2020

BY CM/ECF AND EMAIL

Hon. Analisa Torres,  
United States District Court,  
Southern District of New York,  
Daniel Patrick Moynihan U.S. Courthouse,  
500 Pearl Street,  
New York, NY 10007-1312.

Re: *Contrarian Capital Management LLC, et al. v. Bolivarian Republic of Venezuela*,  
19 Civ. 11018 (S.D.N.Y.) (rel. Nos. 18 Civ. 11940 and 19 Civ. 03123)

Dear Judge Torres:

I write on behalf of Defendant the Bolivarian Republic of Venezuela (the “Republic”) in the above-captioned action (the “Action”). On October 1, 2020, this Court entered an order that, among other things, directed Plaintiffs to submit a motion for attorney’s fees by October 30, 2020, and the Republic to oppose any such motion by November 30, 2020. ECF No. 74. On October 30, Plaintiffs filed their Motion for Attorney Fees (“Plaintiffs’ Fee Motion”). ECF Nos. 82-23. On November 30, the parties made their first extension request. ECF No. 85. The Court granted this request, extending the deadline for the Republic to oppose Plaintiffs’ Fee Motion to December 14. ECF No. 86.

The parties continue to engage in active, good faith discussions to attempt to reach a consensual resolution to this matter. While productive, those discussions have not yet concluded. Plaintiffs informed the Republic on December 10, 2020, that they consent to a two-week extension of the Republic’s time to oppose Plaintiffs’ Fee Motion in order to allow those discussions to continue. Accordingly, in an effort to avoid further litigation in this Action, the Republic respectfully requests that the Court extend the deadline for its opposition to December 28, 2020.

Hon. Analisa Torres

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Respectfully submitted,

/s/ Joseph E. Neuhaus  
Joseph E. Neuhaus

GRANTED. By **December 28, 2020**, Defendant shall file their opposition to Plaintiffs' motion for attorney's fees.

SO ORDERED.

Dated: December 11, 2020  
New York, New York



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ANALISA TORRES  
United States District Judge